

September 13, 2017

Printing Industries of California  
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Ms. Cynthia Dunn  
Senior Environmental Specialist  
California Department of Resources Recycling and Recovery  
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Submitted via email to [Cynthia.Dunn@CalRecycle.ca.gov](mailto:Cynthia.Dunn@CalRecycle.ca.gov)

Re: Draft Screening Criteria for Determining Priority Packaging Types

Dear Ms. Dunn:

Printing industries of California (PIC), which is an affiliate of Printing Industries of America, and the Specialty Graphic Imaging Association (SGIA), appreciates the opportunity to comment on the Draft Screening Criteria for Determining Priority Packaging Types (“Draft Screening Criteria”). We commend CalRecycle’s effort to reach out to a wide variety of stakeholders to develop a set of strategies to achieve an overall 75 percent reduction of solid waste flowing to landfills by the year 2020. The options proposed are source reduction, recycling, or composting.

By way of introduction, PIC is the government affairs office of the three commercial printing industry associations in the state: Printing Industries of San Diego, Printing Industries, Inc. of Southern California, and Visual Media Alliance. SGIA represents screen printers and digital printing operations. Combined, they make California the number one printing producing state in the nation, with over 4,000 firms contributing more than \$8 billion in output, 42,000 jobs, and \$1.9 billion in labor income to state’s economy.

In preparation for the public workshops of September 19, 2017 and October 10, 2017, our comments focus on paper/packaging material and products. We agree with many of the concerns previously voiced by American Forest & Paper Association, Grocery Manufacturing Association, and other allied organizations in the paper/packaging community. As with those organizations, we ask that CalRecycle take into consideration the following points:

- Old Corrugated Containers. According to recent data published by the American & Forest Paper Association, the national recovery rate of this category of paper is an impressive 92.7%, which was a continually increase in recover rate from the 84.4% just seven years earlier. Given

the dynamics of the recovery/recycling infrastructure in California, we can infer that similar recovery/recycling rates (and progress) is being experienced and will continue to increase in California.

While the national recovery rate is impressive, more can still be done. The Draft Screening Criteria identifies specific paper/paperboard categories, which through an aggressive awareness campaign, additional gains can be made. For example, Franchise Commercial Disposal Waste Stream for Old Corrugated Containers and Remainder/Composite Paper-Compostable (respectively 5% and 7.2% of 20.4% of paper waste in this category) and especially Franchised Residential Disposed Waste Remainder/Composite Paper-Compostable (currently 8% of total 19.2% paper waste in this category) are prime candidates for increased recovery efforts.

- **Foster Recycling and Composting Program.** Continue to strengthen and publicized recycling programs and public awareness through such activities as encouraging greater utilization of recycling bins in public spaces; community awareness program through newsletters to explain and reinforce the benefits of recycling; how different paper/paperboard materials can be recycled, and provide details about the importance of the recycling supply chain. One good candidate for an education program is pizza boxes. While the contaminated part of the box is not acceptable for recycling, it only represents a portion of the entire box. CalRecycle should initiate a statewide educational program on the separation of the non-contaminated parts of pizza boxes and disposing them into the recycling stream for paper.

- **Sustainable Packaging.** Encourage manufacturers and retailers to optimize packaging design and choose labeling system that supports recycling and educates the consumer about recycling. This can be done by working with groups such as the Sustainable Packaging Coalition, Carton Council, and Food Service Packaging Institute. These organization, and others, are committed to evaluating and reducing package design, choice of materials, processing, and life-cycle. One powerful way to incentivize companies to pursue sustainable packaging would be to create a recognition program for those companies pursuing approaches to create more sustainable packaging. The program could have several aspects addressing size, creativity, source material, recyclability, etc.

- **Extended Producer Responsibility (EPR).** Such a mandated approach will only create an oversight agency that would require significant resources for developing compliance requirements, administration, and added costs the manufacturer and consumer. This approach is a wasteful use of resources, and will not increase recycling rates among the targeted paper/packaging products. This conclusion is supported by a study conducted for the Grocery Manufacturing Association by SAIC Energy, Environment & Infrastructure, and LLC. The study assessed the related costs and benefits of EPRs and the key findings claimed in the report include:

”EPR does not necessarily result in improved overall recycling rates. At 24%, the recycling rate of all municipal solid waste in the U.S. where there is no packaging EPR exceeds Canada's (18%) and the European Union's (23%), where EPR is widely employed EPR does not necessarily prompt changes in packaging design and selection. Despite a faster growing GDP, packaging use in the U.S. declined at a faster rate than in the EU, where EPR is common EPR does not necessarily make waste and recycling systems more efficient or otherwise decrease costs. Ramsey County, Minnesota, a non-EPR jurisdiction,

has a lower net cost per ton (\$156) than EPR programs in Manitoba (\$166) and Ontario(\$202). In fact, EPR programs increase government and administrative costs States and municipalities already have at their disposal a suite of non-EPR policies that are both effective and efficient in terms of raising recycling rates. Together, they can achieve high recycling rates, without excess cost or administrative burden that results from EPR.“

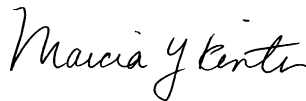
We believe that the right approach to achieve the 75 percent diversion goal in solid waste lies in an increase in participation rate. We strongly support efforts to expand the voluntary recovery of paper/packaging. Paper is one of the most sustainable materials that can be used for packaging and is a key component in the emerging circular economy. In California recycling of all types of paper is a success story that can be further enhanced. We encourage CalRecycle to use its resources to educate and expand paper recovery options so that the overall recovery goal can be achieved.

We appreciate the opportunity to share our thoughts on this matter. We look forward to participating in the workshop on September 19, 2017 and October 10, 2017.

Sincerely,



Gerry Bonetto, Ph.D.  
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